

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**JOHN COLLINS-MUHAMMAD,**

**LEWIS REED, and**

**JEFFREY BOYD,**

Defendants.

No. 4:22-CR-00297 SRC/JMB

**UNITED STATES' MOTION FOR COMPLEX CASE FINDING AND TO CONTINUE  
TRIAL DATE BEYOND LIMITS SET BY THE SPEEDY TRIAL ACT**

Comes now the United States of America by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri and Hal Goldsmith, Assistant United States Attorney for said District, and requests the Court, pursuant to Title 18, United States Code, Sections 3161(h)(7)(A) and (B)(i) and (ii), to make findings that: (1) the case is so unusual or so complex that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by the Speedy Trial Act and (2) that the failure to grant a continuance to determine whether and what pretrial motions should be filed in the proceeding would result in a miscarriage of justice. The United States respectfully states, in support of its Motion, as follows:

1. This case involves a long-term public corruption investigation, from January, 2020 through March, 2022, for which the three named defendants have been charged with multiple bribery and public corruption charges in a 66 page Indictment.

2. The United States estimates that the trial in this case could potentially last three to four weeks, depending upon the number of defendants electing to proceed to trial. A more

accurate estimate can be made when the number of defendants electing to go to trial has been determined.

3. The discovery in this case is voluminous and involves several hundred audio and video recordings of meetings and telephone calls, hundreds of email and text message communications, court ordered search warrants, pen register information, toll records, and records of various financial institutions. Complete discovery has been provided to counsel for both defendant John Collins-Muhammad and defendant Lewis Reed. Counsel for Jeffrey Boyd has moved to withdraw from the case, and no substitute counsel has entered an appearance in order to receive discovery.

4. The United States has been working on the investigation for some time and would be prepared to try this case within the time limits set forth under the Speedy Trial Act. However, the United States recognizes that, in light of the number of defendants, the nature of the charges, and the voluminous discovery, it is unreasonable to expect the defense to have adequate preparation for pretrial proceedings or for the trial itself within the time limits established by the Speedy Trial Act.

5. Additional time would likely assist defendants and defense counsel in fully reviewing discovery, preparing for trial and/or completing plea negotiations with the United States.

6. Pursuant to Title 18, United States Code, Sections 31671(h)(7)(A) and (B)(i) and (B)(ii) and for all of the forgoing reasons, the United States requests this Court to make specific findings that the trial of this matter should be continued past the limits set by the Speedy Trial Act because the ends of justice served by continuing this case outweigh the best interest of the public and the defendants in a speedy trial, the case is so unusual and so complex that it is unreasonable

to expect adequate preparation for pretrial proceedings and the failure to exclude this period would likely result in a miscarriage of justice.

7. As this Court is aware, on June 2, 2022, during defendants' initial appearances and arraignments, all three defendants and their counsel advised that they have no objection to this Motion.

WHEREFORE, the United States respectfully requests that the Court make such findings, set a motion deadline and an evidentiary hearing consistent with the complexity of the case, and order the time elapsed between any motion waivers and trial setting excluded from Speedy Trial Act calculation. 18 U.S.C., Section 3161(h)(7)(A), (B)(i), and (B)(ii).

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Hal Goldsmith  
HAL GOLDSMITH, #32984MO  
Assistant United States Attorney  
111 S. 10th Street, Room 20.333  
St. Louis, Missouri 63102

**CERTIFICATE OF SERVICE**

I hereby certify that on June 7, 2022, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Hal Goldsmith

HAL GOLDSMITH, #32984MO

Assistant United States Attorney